

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

STEVEN DE COSTA, in his)	CIVIL NO. 03-00598 DAE/LEK
representative capacity as)	
Chairperson of the Board of)	
Trustees of United Public Workers,)	
AFSCME Local 646, AFL-CIO,)	AFFIDAVIT OF GARY W.
Mutual Aid Fund Trust, Real Party)	RODRIGUES
in Interest, United Public Workers,)	
Local 646, AFL-CIO,)	
)	
Plaintiff,)	
)	
vs.)	
)	
GARY W. RODRIGUES,)	
)	
Defendant.)	
)	

AFFIDAVIT OF GARY W. RODRIGUES

STATE OF HAWAII)	
)	SS.
COUNTY OF KAUAI)	

GARY W. RODRIGUES, being first duly sworn on oath, deposes and
says:

- (1) I am the Defendant in the above entitled matter.
- (2) I have personal knowledge of the matters addressed herein.
- (3) Attached to Defendant's Concise Statement of Material Facts

filed March 28, 2007 as Exhibit 2 is a true and correct copy of the document

and/or instrument establishing the Mutual Aid Trust.

(4) Attached to Defendant's Concise Statement of Material Facts in Support of Defendant's Renewed Motion for Summary Judgment filed October 24, 2007 as Exhibit 2 is a true and correct copy of a letter dated May 12, 1994 which I received from Larry P. Weinberg, General Counsel, AFSCME.

(5) Attached to Defendant's Concise Statement of Material Facts in Support of Defendant's Renewed Motion for Summary Judgment filed October 24, 2007 as Exhibit 3 is a true and correct copy of the minutes of the Mutual Aid Fund Trustees Meeting on June 21, 1994.


GARY W. RODRIGUES

Subscribed and sworn to before me
this 14 day of November 2007


Notary Public, State of Hawai'i
My Commission Expires: 3-4-2011

